

(“EIDL”) applications submitted electronically to the United States Small Business Administration (“SBA”) and in loan applications electronically submitted to lenders through the Payroll Protection Program (“PPP”) to unlawfully induce the SBA and lenders to dispense money and funds to Defendant to which he was not entitled, and Defendant, in turn, would pay a portion of the ill-gotten funds to CC-1 as a kickback.

3. In furtherance of this scheme, and to effect the objects thereof, the following acts were committed in furtherance of the conspiracy:

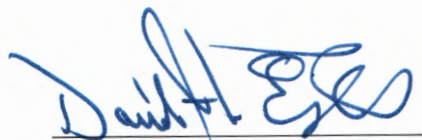
a. It was part of the conspiracy that between in or about July 2020, Defendant and CC-1 utilized cellular devices and the internet to create fraudulent EIDL and PPP applications. Defendant provided his personal identifying information to CC-1, who in turn, would use the internet to create fraudulent EIDL and PPP applications. In particular, the conspirators caused to be submitted a fraudulent EIDL application in July 2020 to the SBA, which in turn, by means of wire communication originating outside the States of Georgia and Texas, deposited \$7,500 into Defendant’s bank account on July 20, 2020. In exchange for CC-1 completing the fraudulent EIDL application, Defendant agreed to pay and, on July 21, 2020, did pay \$3,000 to CC-1 by electronic bank transfer.

b. Thereafter, the conspirators caused to be submitted a fraudulent PPP bank loan application with Lendistry SBLC, LLC in Defendant’s name that falsely represented Defendant had a business called “WLC Digital Ventures” established on January 1, 2019, and that such business had \$98,400 in gross income for tax year 2020, when in truth and fact, as Defendant and CC-1 both knew,

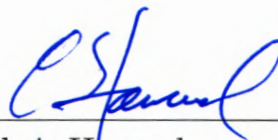
Defendant did not have a business established on such date, nor did he have a business with such reported income. In support of the fraudulent application, CC-1 caused to be submitted a false and fraudulent IRS Schedule C form.

4. In reliance on false representations made in the PPP application, Lendistry SBLC, LLC, by means of wire communication, deposited \$20,500 into Defendant's bank account on or around June 7, 2021. In exchange for CC-1 completing the fraudulent PPP loan application, Defendant agreed to pay CC-1 and, on June 11 and June 14, 2021, did pay CC-1 a total of \$7,500, which was transmitted by electronic bank transfer.

All done in violation of Title 18, United States Code, Section 1349.



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